Janet Brown

9 Carpenter Court

San Francisco, California [94124]

# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

San Francisco Division

Janet Brown,

Plaintiff/Petitioner.

W.

CITY OF SAN FRANCISCO et al.,

Defendant/Respondent

Case No.: 24-cv-00466-LB

ADDENDUM TO COMPLAINT

Plaintiff, Janet Brown, hereby submits this Addendum to the complaint filed in the above-captioned matter, stating as follows:

### I. City and County of San Francisco - Illegal Recording of Deed of Trust

The City and County of San Francisco, acting through its agents and employees, unlawfully recorded the Deed of Trust on November 22, 2021 without any statutory or legal requirement to do so. There exists no law or statute in California or the United States that mandates such a recording when the property at issue is the subject of disputed ownership and title. This recording, therefore, constitutes an overreach and abuse of municipal powers, resulting in the improper foreclosure of the Plaintiff's property. Plaintiff seeks declaratory relief invalidating the

Deed of Trust recorded by the City and County of San Francisco and damages for the harm caused by this illegal act.

#### II. David G. Winford, et al. - Real Estate Fraud and Conspiracy

David G. Winford and his associates conspired to commit real estate fraud by failing to verify ownership of the subject property before initiating and proceeding with the illegal foreclosure, sale, and auction. Despite having access to records indicating a lack of legitimate ownership transfer, Winford and his associates chose to willfully ignore such evidence, perpetuating a fraudulent foreclosure process. This fraudulent scheme deprived Plaintiff of their legal and rightful ownership of the property. Plaintiff seeks damages and equitable relief, including restitution and punitive damages, against David G. Winford and all involved co-conspirators for their unlawful actions.

#### M. Derik N. Lewis, Esq. - Legal Malpractice

Plaintiff further asserts that Derik N. Lewis, Esq., provided negligent legal advice by recommending that the subject property be removed from its Trust to allegedly "protect" it. This advice directly resulted in a weakened legal position for the Plaintiff and contributed to the unlewful foreclosure process. By advising the Plaintiff to take an action that was contrary to their best interests, Derik N. Lewis engaged in legal malpractice. Plaintiff seeks damages for the harm caused by this erroneous legal counset, including the loss of property and emotional distress.

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

# Case 3:24-cv-00466-LB Document 13 Filed 10/01/24 Page 3 of 11

1	1.	An order invalidating the Deed of Trust recorded by the	City and County of	f San
2	Fran	ncisco;		
3	2.	Compensatory and punitive damages against all Defen	dants, including Da	ivid G.
4	Win	ford and associates, for real estate fraud and conspiracy;		
5	3.	Damages for legal malpractice against Defendant Deril	N. Lewis, Esq.;	
€	4.	Attorneys' fees, costs, and any other relief the Court de		able.
7				
0	Date	ed: September 30, 2024		
9	Res	pectfulty submitted,		
10				
1	9-	(Cyc)		
2		et Brown		
13	Plain	ntiff, Pro Se		
.4				
15				
16				
7	V.			
18				
19				- 4
20				
21		The state of the s		
22				
23				
24				
25				
26				
27				
28				

Attached you will find all 4 proofs of service, which in using a process server, I believed they would be providing those to the court.

	RTY WITHOUT ATTORNEY (Nam rownsky 2014@gmail.com>	e, State, Bar number, and address):		FOR COURT USE CHLY
	ONE NO.: 415-377-4058			
E-MAIL ADDRESS ATTORNEY FO	(DpAcess). IR (Norse): JAMET BROWN			
	District Court, Northern (	1		
	DOMESS: 450 Golden Gale / DOMESS: 450 Golden Gale /			
CHY AND 2	or cook: Sen Frencisco 94	109		3
ISKANE	Philip Burton Fed	erei Building		
PLAINTIFF	PETITIONER: JANET BRO	env .		CASE MUNBER
DEFENDANTIRE	ESPONDENT: CITY OF 8A	N FRANCISCO, CALIFORNIA		24-CV-00488-LB
PROC	of SERVICE	HEARING DAYE/TIME: 04/25/2924 11:00 AM	HEARING DEPTION:	EN No. of Floring: CV24-0466 LB
. At the time	of service I was at least	18 years of age and not	e party to this action.	
2. I served con	oles of (specify docume	nts):		ID ADR DEADLINES
SUBPOEN	A; ORDER SETTING I	(ITIAL CASE MANAGE)	MENT CONFERENCE AN	ID ADR DEADLINES
	sived (specify name of ) ZBS Law, LLP	arty es shown on docum	nents aerved):	
ь. 🕮	Person (other than the p	party in item 3a) served o	on behalf of an entity or as	an authorized agent (and not a person unde
	Kim Bowers, I delivere accept with identity or	ed the documents to Kit onlinned by subject strains al appeared to be a bro	m Bowers who Identifies ting their name. The Ind	hip to the party named in item 3a ): I themselves as the person authorized to tvidual accepted earvice with direct contact 56-86 years of age, 5'6"-5'8" tall at
	nere the party was serve 30 Corporate Park, Sb	ed: ± 450, Irvine, CA 92806		
5 I served the	s party (check proper ho	nx)		
a [7]	by personal service. I	personally delivered the	documents listed in Item 2 06/2024 at (Ilme): 10:49 A	to the party or person authorized to receive
b 🗀	by substituted service of (name and title or rel	curnents listed in illam 2 with or in the presen		
	(1) (business) the person to	person at least 18 years be served. I informed by	s of age apparently in cha im or her of the general na	rge at the office or usual place of business of dure of the papers.
	(2) (home) a co of abode of t	mpetent member of the f he party. I informed him	nousehold (at least 18 yea or her of the general natur	rs of age) at the dwelling house or usual place of the papers.
	address of the	idress unknown) a para ne person to be served, a general nature of the pa	other than a United States	e apparently in charge at the usual mailing Postal Service post office box. I informed hir
	(4) thereafter r place where from (city):	nailed (by first-class, pos the copies were laft (Cor	de Civ. Proc., § 415.20). 1	e documents to the person to be served at the mailed the documents on (dete): lanation of mailing is attached.
	F. 15 Teach F. 15 Teacher		or a ded	enaborr or mailing as enectica.

REF: CV24-0466

Tracking #: 0126506291

## Case 3:24-cv-00466-LB Document 13 Filed 10/01/24 Page 6 of 11

PLAINTIFF/PETITIONER: JANET BROWN		CARE MUMBER.	
DEFENDANT/RESPONDENT: CITY OF SAN FRANCISC	CO, CALIFORNIA	2	4-CV-00468-L8
c. by mail and acknowledgement of co address shown in item 4, by first-class	eceipt of service. I mailed the doo s mall, postage prepaid,	amenia ilsied in ile	m 2 to the party, to the
(1) on (date).	(2) from (city):		
(3) with two copies of the Noti addressed to me. (Attach	ics and Acknowledgement of Rece completed Notice and Acknowledg	upt and a postage ( pernant of Receipt.)	caid return envelope (Code Civ. Proc., § 415.30)
(4) to an address outside Call	lfornia with return receipt requeste	d. (Code Civ. Proc.,	§ 415.40)
d by other means (specify means of se	ervice and authorizing code section	7):	
Additional page describing service is a	etteched.		
6. Person who served papers			
a. Name: James Stoner b. Address: 2226 Private RD, No c. Telephone number: 949-423-6915 d. The fee for service was: \$ 140.00 e. I am:	lewport Besch, CA 92680		
(1) not a registered California process	s server.		100
(2) exempt from registration under Bu	usiness and Professions Code sec	tion 22360(h)	8V *A
(3) X registered California procesa serv	Name of the second seco		
(f) wmer employe (ii) Registration No.: 8282	1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	r. For: Registration 5:	ASC Legal Services, LLC 8778
2.200 (2 <del>.200</del> ) 4.20 <del>0</del> (4.20 <del>0</del> ) 4.000 (1.200 ) 4.000 (1.200 )	nly Of Orange	County:	Los Angeles
7. X I declare under pensity of perjury under t	to a supplied to the supplied	120101000	SCHOOLS SECTION 1
or			
8. I am a California sheriff or marehal and	d I certify that the foregoing is true	and correct.	
Date: 03/06/2024		0-	_
t, constrawce tens		1/-	40
James Stoner :NAME OF PERSON WHO SERVED PAPERSISHERIFF OR WARS	SHALY	CRIGHAT	URSEN

REF: CV2

Page 2 of 2 Tracking #: 0126506291

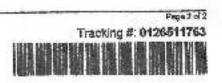
	  brownjey2014@gmall.com>	ine. Slade. Son muradien, sond seletrassa):		FOR COURT USE ONLY		
E-MAIL ACCORE	PHONE NO.: 415-377-4068 55 (Uplonal): FOR plants: JAMET BROWN					
	is District Gourt, Northern	Oistrict of California		-{		
(C)2737	7 ADDRESS: 459 Golden Galla					
10000000	9 ACOREB3: 459 Golden Salte ID ZIP CCGE. See Frenchen Se					
	WICH NAME. Philip Burton Fe			1		
PLAINTIP	F/PETITIONER: JANET BRO	NNN		CASE MINNER		
DEFENDANT	RESPONDENT: CITY OF SA	M FRANCISCO, CALIFORNIA		24-CV-00486-LB		
PRO	OOF OF SERVICE	HEARING DATEMME: 66/25/2024 11:00 AM	HEARING DEPT./DIV.:	Ref. No. or File No.: CV24-0488 LB		
2. I served o	copies of (specify docume			ID ADR DEADLINES		
SUBPOR	NA; ORDER SETTING I	MITIAL CASE MANAGEN	MENT CONFERENCE AN	ID ADR DEADLINES		
3. s. Perty	served (specify name of VANTIS LAW FIRM O	party as shown on docum ORPORATION	ents served);			
b. 🛣	item 5b whom substitut Erice Mertinez, I delive to accept with identity direct delivery. The in	ed service was made) (sp ered the documents to E y comfirmed by subject s	ecify name and relations irlea Martinez who iden aying yes when named a black-halred Hispani	s an authorized agent (and not a person under hip to the party named in item 3e.): Offied themselves as the person authorized . The individual accepted service with a female contact 36-46 years of age, 6'4"		
4. Address	where the party was serv		-			
5. I served t	he party (check proper b	nark				
a. 🔼	by personal service. I			to the party or person authorized to receive		
ь. 🗀	by substituted service of (name and title or re-	e. On (date): lationship to person indica		currents listed in item 2 with or in the presence		
		s person at least 18 years o be served. I informed his		rge at the office or usual place of business of sture of the papers.		
		empetent member of the hi the party. I informed him o		rs of age) at the dwelling house or usual place re of the papers.		
	address of t	ddress unknown) a perso he person to be served, of general nature of the pap	her than a United States	e apparently in charge at the usual mailing Postal Service post office box. I informed him		
			e Chv. Proc., § 415.20). I	e documents to the person to be served at the mailed the documents on (date): aration of mailing is attached.		
	(5) attach a de	eclaration of diligence st	aling actions taken first to	attempt personal service.		

REF: CV24-0466 LB

Code of Chil Procedure § 1011
Tracking #; 0128511763

PLAIN	IFF/PETITIONER: JAMET BROWN	CASE HUMBER		
DEFENDAN	T/RESPONDENT: CITY OF SAN FRANCISCO, CALIFORNIA	24	I-CV-00468-LB	
a [	by mall and acknowledgement of receipt of service. I mailed the deaddress shown in item 4, by first-class mail, postage prepaid,	documenta listed in iter	n 2 to the party, to the	
	(1) on (date). (2) from (oky):			
	(3) with two copies of the Motice and Acknowledgement of Re addressed to me. (Attach completed Notice and Acknowle	eceipt and a postage-p edgement of Receipt)	eid return emrelope (Code Civ. Proc., § 415.30)	
	(4) to an address outside California with return receipt reques	sted. (Code Civ. Proc.,	§ 415.40)	
d. [	by other means (specify means of service and authorizing code sec	tion):		
	Additional page describing service is attached.			
3. Persor	who served papers			
c. Tel	hess: 2228 Private RD, Newport Beach, CA 92990 ephone number: 949-423-6916 fee for service was: \$ 140.00			
(1)	not a registered California procesa servar.		9	
(2)	exempt from registration under Business and Professions Code	section 22350(b).		
(3)	registered California process server.			
	(i) wmer memployee independent contraction (ii) Registration No.: 6262	ctor. For: Registration #:	ABC Legal Services, LLC 8778	
	(iii) X County: County Of Orange	County:	Los Angeles	
7. [37]	I declare under penalty of perjury under the laws of the State of Californ	nia that the foregoing Is	true and correct.	
	or			
a. 🔲	I am a California shuriff or marshal and I certify that the foregoing is	true and correct.		
Date: 03	/06/2024	0 -	-	
Liene.		1/2	4	
22.07-00	James Stoner	/ O SIGNAT		

(NAME OF PERSON WHO SERVED PAPARASISHERIFF OR MARSHAL)



	R PARTY WITHOUT AT TORNEY (Name of Chrowinjay 2011 4 (Sigmest compo- Ct	ve, State, Ber sumber, and addresse.		ADM COURT USE ONLY	
TE	EPHORE NO: 415-377-4059	FAX WO. (Carous).		1	
	ESS (Optional).				
ALTORNE	Y FOR (Name) JAKET BROWN				
United Sin	tes District Court, Northern				
750000	ELAUDRESS. 450 Globben Gate				
	NO ADDNESS. 455 Oslden Gate				
( )	NO 21P CODE. Sem Francisco 94 RANCH MARK. Phillip Burton Fer				
	FF/PETITIONER: JANET BRO			GASE NUMBER	
	T/RESPONDENT: CITY OF SA			24-CV-00488-LB	
DEI CHOPPE	THEOR CHEETERS. ON THE	<del></del>	ATTENIA DESTINA	-	
PR	OOF OF SERVICE	HEARING DATE/TIME: 94/25/2024 11:00 AM	HEARING DEPTJON	CV24-0468 LB	
2, I served	ne of service I was at least copies of (apacify docume ENA; ORDER SETTING II	ints):		HD ADR DEADLINES	
3. s. Part	y served (specify neme of Shirley N. Weber, Ph.)	A STATE OF THE PARTY OF THE PAR	ents served):		
b. 🔯				an authorized agent (and not a person under hip to the party named in item 3a ):	
	deputy secretary of si with direct delivery. T	ate with identity confirm	ed by subject stating to be a black-haired Asi	tity SOS who identified themselves as the heir name. The Individual accepted service an female contact 25-35 years of age, 5'6"	
4. Address	where the party was servi				
	1500 11th St, Sagrame	into, CA 96814			
5. I served	the party (check proper live	DX)			
а. 💢		personally delivered the d as party (1) on (date): 03/0		to the party or person authorized to receive.	
b	by substituted service of (name and title or re)	. On (date): stronship to person indica		cuments listed in item 2 with or in the presence	
		a person et least 18 years be served. I informed hir		rge at the office or usual place of business of ature of the papers.	
		sars of age) at the dwelling house or usual place ure of the papers.			
	address of ti		her than a United States	e apperently in charge at the usual mailing Postal Service post office box, I Informed him	
			e Clv. Proc., § 415.20). I	e documents to the person to be served at the mailed the documents on (date): laration of mailing is attached.	
	(5) I struct a de	eleration of diligence st	aling actions taken first to	attempt personal service.	

REF: CV24-0468 LB

Code of Civil Procedure, § 10\*1
Tracking #: 0126733361

PLAINTIFF/PETITION	CASE MUMBER	
REFERDANT/RESPONDE	NT: CITY OF SAN FRANCISCO, CALIFORNIA	24-CV-00466-LB
c. by mail address	and acknowledgement of receipt of service. I maile shown in item 4, by first-class mail, poetage prepaid,	d the documents listed in item 2 to the party, to the
(1) on (d	ale): (2) from (	олу):
(3)	with two copies of the Notice and Acknowledgement addressed to me. (Attach completed Notice and Ack	if of Receipt and a postage-paid return envelope knowledgement of Receipt.) (Code Civ. Proc., § 415.3
(4)	to an address outside California with return receipt of	requested. (Code Civ. Proc., § 415.40)
d. try other	means (specify means of service and authorizing coo	de saction):
Addition:	I page describing service is attached.	
. Person who serve	J papers	
a. Nente: b. Address: c. Telephone num d. The fee for serv e. Lam:	Kenneth Woo 4010 Footbills Stvd, Suite 103-73, Rosevill er: 916-796-2799 ce was: \$ 140.00	e, CA 86747
V2000 00 1000 00 00 00 00 00 00 00 00 00 0	registered California process server.	
1000000 mm - 0000 1000000	npt from registration under Business and Professions	Code section 22350(b).
(3) X regis (0)	tered California process server:  owner employee independent of Registration No.: 16-003	contractor. For: ABC Legal Services, L Registration #: 8779
7.9.3	County: Placer County GA	County: Los Angeles
r. X I declare u	nder penalty of perjury under the laws of the State of C formis sheriff or marshal and I cortify that the forego	
	Kenneth Woo Ho served exercasishener or warshal)	MAC 50

REF: CV24-0466 LE

Page 2 of 2 Tracking #: 0126733361

## Case 3:24-cv-00466-LB Document 13 Filed 10/01/24 Page 11 of 11

# PROOF OF SERVICE

I, the undersigned, declare that I served the Notice(s) below indicated:

AFFIDAVIT OF NOTICE REGARDING PRIVATE ESTATE

The above described Notice(s) were s	erved on the folk	wing named parties in the man	mer set forth belo	940:
NAME: Joequin Torres ADDRESS: 1 Dr Cariton B Goodle	tt PI, Ste 190, S:	en Francisco, CA 84102		
1. PERSONAL SERVICE	By delivering (1) on: 03/28 (2) st: 12:44		n of the above pe	receally:
c. Telephone number: 416-666 d. The fee for service was: \$ 140,00 e. Lam; (1)	reciado et, San Francisco 9416 nte process servi n under Busines poess server:	oo, GA 94110		ng is true and correct  ABC Legal Services, LLC
(ii) X Registration		and w	Registration #:	
(iii) X Caunty:	Alameda	county	County:	Los Angeles
or California shariff or m		vs of the State of California that		true and correct.
Oscar Precised			GUS	